

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

IN RE NEW ENGLAND COMPOUNDING  
PHARMACY, INC. PRODUCTS LIABILITY  
LITIGATION

THIS DOCUMENT RELATES TO:

## All Suits Against the Saint Thomas Entities

MDL No. 2419  
Dkt. No 1:13-md-2419 (RWZ)

## **SAINT THOMAS ENTITIES' CERTIFICATE OF GOOD FAITH**

In accordance with T.C.A. § 29-26-122, counsel for the Saint Thomas Entities<sup>1</sup> file this certification<sup>2</sup> that they have consulted with one (1) or more experts who have provided a signed written statement confirming upon information and belief they:

- (a) Believe, based upon the information reviewed concerning the care and treatment of Plaintiffs for the incidents at issue, that there is a good faith basis to allege fault against another consistent with the requirements of T.C.A. § 29-26-115.

None of the Saint Thomas Entities' counsel has been found to be in violation of T.C.A. § 29-26-122.

<sup>1</sup> Saint Thomas West Hospital f/k/a St. Thomas Hospital; Saint Thomas Health; and Saint Thomas Network.

<sup>2</sup> This certification is intended to apply to all cases in which the Saint Thomas Entities are named as defendants.

Dated: October 31, 2014

By their attorneys,

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**CERTIFICATE OF SERVICE**

I certify that this document filed through the CM/ECF system will be served electronically to the registered participants identified on the Notice of Electronic Filing this 31st day of October, 2014.

/s/ Sarah Kelly

Sarah P. Kelly

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